



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**ZACHARY CARTER**  
*Corporation Counsel*

ANDREW LUCAS  
*Assistant Corporation Counsel*  
E-mail: [alucas@law.nyc.gov](mailto:alucas@law.nyc.gov)  
Phone: (212) 356-2373  
Fax: (212) 356-3559

April 1, 2014

**BY ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Stacey Hessler v. City of New York et al.,  
13 CV 821 (NRB)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary Carter, Corporation Counsel of the City of New York, attorney for defendant City of New York and Officer Jasinski, in the above-referenced action. This letter is provided as a status update per the Court's instructions at the November 22, 2013 initial conference.

To date the parties have completed substantially all document discovery. The parties have completed two depositions in this matter and anticipate two more, that of Plaintiff and Lt. Hall. Plaintiff will be returning to the New York area from Florida in May, and the parties anticipate completing her deposition, and the deposition of Lt. Hall at that time.

The parties have become aware of a service issue with respect to Lt. Hall. Specifically, there are two Lt. John Hall's in the police department and the wrong one appears to have been served with process. The parties are presently acting to resolve that issue, and anticipate a resolution without the necessity of Court intervention. Additionally, plaintiff will be serving the newly added defendant, Officer McSweeney, once the clerk issues the summons.

For these reasons the parties jointly request a brief extension of discovery until June 1, 2014 to allow for the depositions of Lt. Hall and plaintiff, and for a proposed motion schedule following the close of discovery.

Thank you for your consideration herein.

Very truly yours,

/s/

Andrew Lucas

Assistant Corporation Counsel

Special Federal Litigation Division

cc: Paul Hale (*by ECF*)